



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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*Corporation Counsel*

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May 28, 2025

**VIA ECF**

Honorable Andrew L. Carter  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

Re: Chelsea Hotel Owner LLC, et al. v. City of New York,  
No. 21-cv-3982 (ALC) (RWL)

Your Honor:

I am an attorney in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, which represents Defendant the City of New York (the "City") in the above-referenced action. I submit this letter on behalf of the City, in accordance with Section 6(C) of Your Honor's Individual Practices and paragraph 16 of the so-ordered Stipulated Protective Order, filed on January 10, 2023, ECF 51, seeking leave to file documents under seal.

Specifically, the City seeks permission to conditionally file under seal certain documents, as exhibits to Defendant's motion for summary judgment, which were produced and marked "CONFIDENTIAL" by Plaintiffs during discovery. The City further seeks permission to file one deposition transcript, with conditional redactions, which was designated confidential by Plaintiffs' Notice, served on December 4, 2023, regarding the deposition of Richard Born.

The City does not concede the validity of Plaintiffs' "CONFIDENTIAL" designations, on the documents or the deposition transcript, and Plaintiffs are in the best position to explain why the presumption against public access should be overcome. Nevertheless, out of respect for Plaintiffs' designation and pursuant to the Stipulated Protective Order, the City plans to provisionally file these exhibits under seal and with redactions.

We respectfully request that Plaintiffs be directed to file any request to maintain those materials as redacted and/or under seal within 14 days of the City's filing of its motion.

Thank you for your consideration of this matter.

Respectfully,

Edward Murray  
Assistant Corporation Counsel

Granted. By June 13, 2025, Plaintiff shall file a letter indicating which, if any, of the redacted material should remain under seal, and providing authority to justify maintaining that material under seal.

/s/

SO ORDERED:

6/2/2025



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE